

BATHAEE DUNNE LLP
Yavar Bathaee (CA 282388)
yavar@bathaeedunne.com
Andrew C. Wolinsky (CA 345965)
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835

BATHAEE DUNNE LLP
Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
Edward M. Grauman (admitted *pro hac vice*)
egrauman@bathaeedunne.com
901 S. MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the Advertiser
Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**
Amanda F. Lawrence (admitted *pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (admitted *pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (admitted *pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**
Patrick J. Coughlin (CA 111070)
pcoughlin@scott-scott.com
Carmen A. Medici (CA 248417)
cmedici@scott-scott.com
Hal D. Cunningham (CA 243048)
hcunningham@scott-scott.com
Patrick J. Rodriguez (admitted *pro hac vice*)
prodriguez@scott-scott.com
Daniel J. Brockwell (CA 335983)
dbrockwell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF TILMAN KLUMPP,
PH.D.**

1 I, Tilman Klumpp, Ph.D., declare and state as follows:

2 1. I am an Academic Affiliate at Berkeley Research Group, LLC. I received my M.A.
3 and Ph.D. degrees in economics from the University of Western Ontario, Canada. I am a Professor
4 of Economics at the University of Alberta, Canada, have published articles in a number of academic
5 journals, and have submitted written testimony in the High Court of Justice, Business and Property
6 Courts of England, and Wales Competition List, United Kingdom. I have personal knowledge of
7 the facts set forth in this declaration and, if called as a witness, could and would testify competently
8 to such facts under oath.

9 2. I have been asked by counsel for Advertiser Plaintiffs in the above-captioned
10 litigation to provide certain expert opinions in connection with Advertiser Plaintiffs' Opposition to
11 Defendant Meta Platforms, Inc.'s Motion for Summary Judgment.

12 3. Attached hereto are the reports I have prepared in connection with this assignment:
13 the Expert Merits Report of Tilman Klumpp, Ph.D., dated January 12, 2024 (**Exhibit 4**) and the
14 Expert Merits Rebuttal Report of Tilman Klumpp, Ph.D., dated February 9, 2024 (**Exhibit 5**).

15 4. The attached reports accurately reflect my opinions on the matters contained therein.
16

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.

19 Executed on January 29, 2025, in Edmonton, Alberta, Canada.

20
21 

22
23 Tilman Klumpp, Ph.D.

EXHIBIT 4
[Filed Under Seal]

EXHIBIT 5
[Filed Under Seal]